

WILLIAM D. HARRIS & ASSOCIATES, INC.

1156 15TH STREET, N.W.

SUITE 550

WASHINGTON, D.C. 20005

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FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL  
999 E STREET, N.W.  
WASHINGTON, D.C. 20463

BULK FILE

March 20, 1997

Dawn M. Odrowski  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR 3774

Dear Ms. Odrowski:

Enclosed is my response to the Subpoena to Produce Documents and Order to Submit Written Answers received from your office.

The providing of information and documents herein in response to the request of the Federal Election Commission is not intended to be and should not be construed as a waiver of any rights or privileges to which I am entitled, specifically including the attorney-client privilege or protections under the Commission's Regulations for confidentiality of this response.

Sincerely,



William D. Harris

Enclosure

**BEFORE THE FEDERAL ELECTION COMMISSION**

**AFFIDAVIT OF WILLIAM D. HARRIS**

On information and belief, and upon a complete search of documents and records in my possession, William D. Harris states the following in response to the Subpoena to Produce Documents and Order to Submit Written Answers of the Federal Election Commission:

***Interrogatories***

1. The following are contact persons in the U.S. Senate campaign of Kay Bailey Hutchison with whom I communicated in 1993: Kay Bailey Hutchison, candidate; Ray Hutchison, candidate's husband; Charlie Black, consultant; Karl Rove, consultant; and Jim Francis, campaign chairman.
2. The following are contact persons in the U.S. Senate campaign of Rod Grams with whom I communicated in 1994: Rod Grams, candidate. The following are contact persons in the U.S. Senate campaign of Rick Santorum with whom I communicated in 1994: Rick Santorum, candidate; Pat Meachem, campaign manager; John Brebender, media consultant; and Mark Rodgers, advisor.

***Production of Documents***

1. Enclosed are photocopies of the following:
  - A) Calendar pages from my personal appointment book, beginning when my employment began with the National Republican Senatorial Committee (NRSC) in February of 1993 through December 1993 (used less throughout the year; no entries in book for 1994);
  - B) "WDH" calendar for 1993-4;
  - C) NRSC "master calendar" for March 1993 through October 1994;
  - D) Apparent "hybrid" calendar for beginning of 1993;
  - E) Four separate one-page calendar documents.
2. Other than documents submitted pursuant to Request No. 1 (which may indicate general events or meetings), I am not in possession of any documents containing or referring to any communication concerning federal elections in 1993 between myself and the persons and organizations identified in the Subpoena.

AFFIDAVIT OF WILLIAM D. HARRIS

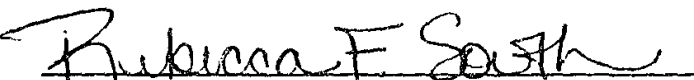
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3. I am not in possession of any documents containing or referring to any communication in 1993 concerning get-out-the-vote activity, voter guides or candidate questionnaires between myself and Kay Bailey Hutchison or representatives of her campaign.
4. Other than documents submitted pursuant to Request No. 1 (which may indicate general events or meetings), I am not in possession of any documents containing or referring to any communication concerning federal elections in 1994 between myself and the persons and organizations identified in the Subpoena.
5. I am not in possession of any documents containing or referring to any communication in 1994 concerning get-out-the-vote activity, voter guides or candidate questionnaires between myself and Rod Grams, or representatives of his campaign, or Rick Santorum, or representatives of his campaign.

The above information is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
WILLIAM D. HARRIS

Sworn and subscribed to in Washington, D.C., by the said William D. Harris  
on 20th day of March 1997.

  
\_\_\_\_\_  
Notary Public

My commission expires: Notary Public, Columbia  
My Commission Expires April 30, 1999